

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-12393(JGD)

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TRICORE, INC.

VS.

SAFECO INSURANCE COMPANY OF
AMERICA and R.P. IANNUCCILLO
& SONS CONSTRUCTION CO.

**DEFENDANT, R.P. IANNUCCILLO & SONS CONSTRUCTION CO.'S
ASSENTED TO MOTION FOR ENLARGEMENT OF TIME TO FILE ITS
OPPOSITION TO SAFECO'S MOTION FOR SUMMARY JUDGMENT**

The Defendant and Counterclaim Plaintiff, R.P. Iannuccillo & Sons Construction Co. ("RPI"), with consent of the Defendant and Counterclaim Defendant, Safeco Insurance Company of America ("Safeco"), respectfully moves for an enlargement of time up to and including December 14, 2005, to file its opposition to Safeco's Motion for Summary Judgment.

Given the novel issues raised by the Motion, RPI submits that additional time is required to research and prepare a Memorandum in Opposition to the Motion together with an affidavit.

WHEREFORE, RPI respectfully requests that the Court:

- a. Allow RPI up to and including December 14, 2005 to file its Opposition.
- b. Grant such further relief as the Court may deem just and appropriate.

Defendant/Counterclaim Plaintiff
R.P. Iannuccillo & Sons Construction Co.
By its Attorneys:



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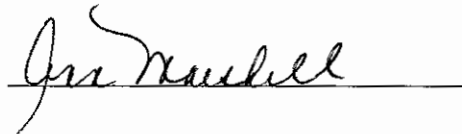
CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing has been furnished by U.S. Mail, postage prepaid, this 30th day of November, 2005, to:

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A handwritten signature in cursive script, appearing to read "John Marshall", is written over a horizontal line.